

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In the Matter of the Application of

HARTFORD FIRE INSURANCE COMPANY,

Petitioner,

- against -

THE EVERGREEN ORGANIZATION, INC.,
CHARLES CARONIA, SR., GARY UPHOUSE,
CHARLES CARONIA, JR., and ANDREJS
KRUTAINIS,

Respondents.

Civil Action No.07-CV-7977 (RJS)

**AFFIDAVIT OF CHRISTOPHER
T. BRADLEY IN SUPPORT OF
MOTION TO ADMIT PHILIP M.
GILLIGAN *PRO HAC VICE***

CHRISTOPHER T. BRADLEY, being duly sworn, states as follows:

1. I am a partner with the firm of Marshall, Conway, Wright & Bradley, P.C. counsel for the Evergreen Organization, Inc., Charles Caronia, Sr., Gary Uphouse, Charles Caronia, Jr., and Andrejs Krutainis in the above captioned case. I am familiar with the proceedings in this case. I make this statement on my personal knowledge of the facts set forth herein and in support of Respondents' motion to admit Philip M. Gilligan as counsel *pro hac vice* to represent the Evergreen Organization, Inc., Charles Caronia, Sr., Gary Uphouse, Charles Caronia, Jr., and Andrejs Krutainis in this matter.

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law on May 22, 1985. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Gilligan is a partner with the firm of Gilligan and Peppelman, LLP. He is admitted to practice law in the State of Pennsylvania and is in good standing with that court. A copy of his certificate of good standing is attached hereto as Exhibit A.

4. Mr. Gilligan is a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.


5. Mr. Gilligan is also familiar with the facts of this case.

6. Accordingly, I move for the admission of Philip M. Gilligan *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Philip M. Gilligan *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Philip M. Gilligan *pro hac vice* in the above captioned matter be granted.

Dated: November 13, 2007
New York, New York


Christopher T. Bradley (CTB-4725)



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Philip M. Gilligan, Esq.

DATE OF ADMISSION

September 10, 1967

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: November 2, 2007

A handwritten signature in black ink, consisting of a large, stylized 'J' and 'P'.

John W. Person, Jr., Esq.
Deputy Prothonotary

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**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Christopher T. Bradley, attorney for Respondents the Evergreen Organization, Inc., Charles Caronia, Sr., Gary Uphouse, Charles Caronia, Jr., and Andrejs Krutainis and said sponsor's affidavit in support;

IT IS HEREBY ORDERED THAT

Philip M. Gilligan
Gilligan and Peppelman, LLP
606 East Baltimore Pike
Media, Pennsylvania 19063
(610) 566-7777
(610) 566-0808 (fax)
pgillig@yahoo.com

is admitted to practice counsel *pro hac vice* as counsel for Respondents the Evergreen Organization, Inc., Charles Caronia, Sr., Gary Uphouse, Charles Caronia, Jr., and Andrejs Krutainis in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. Counsel shall immediately apply for an Electronic Case Filing password. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated:
New York, New York

United States District/Magistrate Judge

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CERTIFICATE OF SERVICE

The undersigned certifies that on the 13th day of November, 2007, I caused a true and copy of the Motion of Respondents The Evergreen Organization, Inc. and Charles Caronia, Sr., Gary Uphouse, Charles Caronia, Jr., and Andrejs Krutainis to Admit Philip M. Gilligan *pro hac vice* and all papers submitted in support of said Motion via electronic filing and regular mail upon the following opposing counsel:

James E. Fitzgerald, Esq.
Michele Jacobson, Esq.
Seema Misra, Esq.
Stroock & Stroock & Lavan LLP
Attorneys for Hartford Fire Insurance Co.
180 Maiden Lane
New York, New York 10038-4982
(212) 806-5400

Dated: November 13, 2007
New York, New York

By: 
Amanda H. Gold

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